

EXHIBIT 1



FIRM RESUME

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THE FIRM

Scott+Scott was founded in 1975 and has since grown into one of the most respected law firms specializing in complex consumer, antitrust, and securities class actions in both the United States and Europe. Today, the Firm is comprised of more than 135 team members, including more than 100 U.S.-based attorneys supported by a seasoned staff of paralegals, IT and document management professionals, financial analysts, and in-house investigators. Scott+Scott's largest offices are in New York and San Diego, with additional U.S. offices located in Connecticut, Virginia, Ohio, and Arizona. The Firm's European offices are located in London, Amsterdam, and Berlin.



CONSUMER PRACTICE GROUP

Scott+Scott's Consumer Practice Group consists of some of the premier advocates in the area of consumer protection and has litigated and secured some of the most significant consumer protection settlements on behalf of its clients, resulting in hundreds of millions of dollars to class members. The Firm's Consumer Practice Group has attorneys dedicated to three primary areas: Data Breach/Data Privacy Litigation, Insurance and Pharmaceutical Litigation, and Consumer Protection Litigation.

DATA BREACH/DATA PRIVACY

Scott+Scott has extensive experience litigating data privacy and data breach class actions, advancing cutting-edge legal theories. The Firm has achieved some of the largest recoveries in this area in a number of data privacy and data breach class actions, including:

- *In re Equifax, Inc. Customer Data Sec. Breach Litig.*, No. 1:17-md-02800 (N.D. Ga.) (lead counsel, claims on behalf of financial institutions injured as a result of the 2017 Equifax data breach that exposed the personal and financial information of approximately 150 million U.S. consumers; preliminary approval of settlement valued at \$32.5 million);
- *In re Google Assistant Privacy Litigation*, No. 5:19-cv-04286 (N.D. Cal.) (lead counsel, certified class on behalf of consumers alleging privacy violations whereby Google Assistant records and discloses their private confidential communications without consent);
- *In re Arkansas Fed. Credit Union v. Hudson's Bay Co.*, No. 1:19-cv-4492 (S.D.N.Y.) (lead counsel, \$5.1 million settlement on behalf of consumers involving data breach of payment card information). In granting final approval of the settlement, the Court commended Scott+Scott for a "job well done.";
- *The Home Depot, Inc., Customer Data Sec. Breach Litig.*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, \$27.25 million settlement on behalf of financial institutions involving data breach and theft of the personal and financial information of over forty million credit and debit card holders);
- *In re Target Corp. Customer Data Sec. Breach Litig.*, MDL No. 2522 (D. Minn.) (executive committee, \$59 million settlement on behalf of financial institutions injured by theft of sensitive payment card information); and
- *Veridian Credit Union v. Eddie Bauer LLC*, No. 2:17-cv-00356 (W.D. Wash.) (co-lead counsel, \$9.8 million settlement).

Recently, in a class action against The Wendy's Co. involving a data breach, the court, in approving the \$50 million dollar settlement, noted that Scott+Scott and its attorneys demonstrated "**very significant experience in these types of class actions and in data breach litigation**" and that the attorneys "**brought to the table an incredible wealth of knowledge,**" and were "**thorough and professional in everything that was provided to the Court.**" *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506, Transcript at 32 (W.D. Pa. Nov. 6, 2019).

ATTORNEY BIOGRAPHY

CAREY ALEXANDER

Mr. Alexander is a partner in the Firm's New York office in the Consumer Practice Group. His practice spans the breadth of consumer protection litigation, focusing primarily on data privacy, data breach, and deceptive pricing claims.

Mr. Alexander has been recognized for his efforts on behalf of the classes he has represented and has appeared on the Super Lawyers New York Metro Rising Stars list every year since 2016. Judge Castel of the Southern District of New York recently commended Mr. Alexander and his colleagues for their "extensive experience in litigating data breach class actions in federal courts."

Mr. Alexander serves as part of the appointed leadership steering numerous class actions representing consumers in state and federal courts throughout the United States, including: *Alves v. BJ's Wholesale Club, Inc.*, No. 2284CV02509 (Mass. Super. Ct.) (Interim Co-Lead Class Counsel); *In re Shields Health Care Group Inc. Data Breach Litig.*, No. 1:22-cv-10901 (D. Mass.) (Interim Executive Committee); *In re BPS Direct, LLC and Cabela's, LLC Wiretapping Litig.*, No. 2:23-md-03074 (E.D. Pa.) (Plaintiffs' Steering Committee); and *In re TikTok Inc. In App Browser Privacy Litig.*, No. 1:24-cv-02110 (N.D. Ill.) (Plaintiffs' Steering Committee).

His representative cases include: *In re Equifax, Inc., Customer Data Security Breach Litig.*, No. 1:17-md-2800 (N.D. Ga.) (settlement valued at \$32.5 million); *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-506 (W.D. Pa.) (settlement valued at \$50 million); *Morrow v. Ann Inc.*, No. 1:16-cv-3340 (S.D.N.Y.) (settlement valued at \$7.6 million); *Luca v. Wyndham Worldwide Corp.*, No. 2:16-cv-00746 (W.D. Pa.) (settlement valued at \$7.6 settlement); and *Ark. Fed. Credit Union v. Hudson's Bay Co.*, No. 1:19-cv-04492-PKC (S.D.N.Y.) (settlement valued at \$5.1 million).

During law school, Mr. Alexander served as an editor of the St. John's Law Review. His note, *Abusive: Dodd-Frank Section 1031 and the Continuing Struggle to Protect Consumers*, 85 St. John's L. Rev. 1105 (2012), has been cited in judicial opinions and in several legal journals, including the Harvard Law Review.

Before joining the bar, Mr. Alexander served as an editor of the widely acclaimed consumer-advocacy blog The Consumerist. He also served as a policy advisor to the Bronx Borough President, worked as part of the National Campaign to Restore Civil Rights, and participated in the Fellowship for Emerging Leaders in Public Service at NYU's Robert F. Wagner Graduate School of Public Service.

In his spare time, Mr. Alexander serves as an appointed member of Manhattan's Community Board 7 and the New York City Bar Association's Consumer Affairs Committee. He also serves as a volunteer Arbitrator in New York City's Small Claims Court.

A graduate of St. John's University School of Law (J.D., *magna cum laude*, 2012) and Skidmore College (B.A., 2004), Mr. Alexander holds admissions in the State of New York; the United States Courts of Appeal for the First, Third, and Ninth Circuits; and the United States District Courts in the Southern, Eastern, and Western Districts of New York; the Northern District of Illinois; the Eastern District of Wisconsin; the District of Colorado; and the District of Connecticut.